

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**DANIEL BRYAN KELLY,**

**Plaintiff,**

**V.**

RICKY OWENS, et al.,

## Defendants.

$$\begin{pmatrix} \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \\ \cdot \end{pmatrix}$$

**) CIVIL ACTION NO. 2:05-cv-1150-MHT-TFM**

**JOINT MOTION FOR HIPAA PROTECTIVE ORDER**

COME NOW the Parties and jointly request that the Court enter this Court's standard Qualified HIPAA Protective Order.

1. The Plaintiff's claims in this case involve matters that will require discovery of information protected by HIPAA.

2. The undersigned counsel has consulted with Richard Stockham, attorney for the Plaintiff and Kristi McDonald, attorney for Defendants Terry Wilson, Wendy Roberson, and Al Bradley. The undersigned has been authorized by said counsel to represent to the Court that Parties desire that the Court issue the attached proposed HIPAA Order. The proposed Order has been reviewed and approved by Ms. McDonald and Mr. Stockham.

WHEREFORE, premises considered, the Parties request that the Court adopt and issue the attached proposed Qualified HIPAA Protective Order.

Respectfully submitted this the 17th day of July, 2007.

**s/ Gary L. Willford, Jr.**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 17th day of July, 2007, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to the following CM/ECF participants, **Richard Stockham and Kristi McDonald**.

**s/Gary L. Willford, Jr.**  
OF COUNSEL